

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

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CENTRO PRESENTE, a membership organization,  
*et al.*,

Plaintiffs,

v.

JOSEPH R. BIDEN, JR., President of the United  
States, in his official capacity, *et al.*,

Defendants.

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No. 1:18-cv-10340 (DJC)

**JOINT STATUS REPORT**

As directed by this Court’s February 10, 2021 Order (ECF No. 146), following submission of the parties’ last Joint Status Report on February 8, 2021 (ECF No. 145), Plaintiffs and Defendants respectfully submit this Joint Status Report. In its February 10, 2021 Order, this Court “extended the stay in this case” until April 8, 2021. ECF No. 146. The parties jointly request for this Court to extend the stay in this case to June 7, 2021, for the new administration to continue to consider its position in this case. In the meantime, the terminations of Temporary Protected Status (TPS) for Haiti, El Salvador, and Honduras, remain either enjoined or stayed per court order. *See Saget v. Trump*, No. 19-1685 (2d Cir.) (March 9, 2021 order holding appeal of injunction in abeyance pending the Government’s internal review of its decision to terminate Haiti’s TPS); *Ramos v. Nielsen*, No. 18-16981 (9th Cir.) (Feb. 16, 2021 order granting 60 day stay of consideration of rehearing en banc petition for appeal, and thus stay of any mandate, of panel’s decision to reverse injunction of TPS terminations for, *inter alia*, Haiti and El Salvador); *Bhattarai v. Nielsen*, Case No. 3:19-cv-731-EMC (N.D. Cal.), ECF No. 23, at ¶ 6 (court order

staying termination of TPS for Honduras pending *Ramos* appeal). Accordingly, the parties respectfully request to continue the stay in this matter through June 7, 2021.

Respectfully submitted,

Plaintiffs.

By their attorneys,

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Dated: April 8, 2021

Defendants

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**CERTIFICATE OF SERVICE**

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants.

Dated: April 8, 2021

/s/ Adam Kirschner